

# Exhibit B

**From:** Safier, Paul J.  
**Sent:** Wednesday, March 26, 2025 4:29 PM  
**To:** Anna Estevao; Sullivan, Thomas B.  
**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

Thank you.

**Paul J. Safier**  
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**From:** Anna Estevao <AEstevao@shertremonte.com>  
**Sent:** Wednesday, March 26, 2025 4:28 PM  
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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

**⚠ EXTERNAL**

Yes, April 8 is fine. Thanks again.

Anna



**Anna Estevao**  
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**From:** Safier, Paul J. <[SafierP@ballardspahr.com](mailto:SafierP@ballardspahr.com)>  
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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

Thanks, Anna. That's fine. How about April 8 for the new return date? I am traveling for depositions on April 3-7. So, anything short of that would be tough.

**Paul J. Safier**

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**From:** Anna Estevao <[AEstevao@shertremonte.com](mailto:AEstevao@shertremonte.com)>

**Sent:** Wednesday, March 26, 2025 3:53 PM

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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

**⚠ EXTERNAL**

Apologies, but can we reschedule our call? I haven't had a chance to run this to ground with the team. We would agree to extending the return date out further so that we can continue conferring.

Thanks,  
Anna



**Anna Estevao**

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**From:** Safier, Paul J. <[SafierP@ballardspahr.com](mailto:SafierP@ballardspahr.com)>

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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

Hi Anna – Attached is the Shah decision we meant to reference. I might have screwed up the cite when I tried to translate from LEXIS to Westlaw.

Thanks,  
Paul

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**From:** Anna Estevao <[AEstevao@shertremonte.com](mailto:AEstevao@shertremonte.com)>

**Sent:** Monday, March 24, 2025 4:07 PM

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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

**EXTERNAL**

Confirming the extension of the return date to April 1. Thanks and speak to you again tomorrow.

Best,  
Anna



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**From:** Safier, Paul J. <[SafierP@ballardspahr.com](mailto:SafierP@ballardspahr.com)>

**Sent:** Monday, March 24, 2025 4:05 PM

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**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

Anna – It was nice speaking with you. Here are some of the case citations on the reporter's privilege that we referenced during our meeting:

- *United States v. Treacy*, 639 F.3d 32 (2d Cir. 2011)
- *Gonzales v. NBC*, 194 F.3d 29 (2d Cir. 1998)
- *United States v. Burke*, 700 F.2d 70 (2d Cir. 1983)
- *United States v. Shah*, 2022 WL 1284550 (S.D.N.Y. Apr. 29, 2022)
- *In re McCray, Richardson, Santana, Wise & Salaam Litig.*, 991 F. Supp. 2d 464 (S.D.N.Y. 2013)

Please confirm by email that the return date on the subpoena has been extended to April 1. Thank you, and talk to you tomorrow.

Best,  
Paul

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**Cc:** Safier, Paul J. <[SafierP@ballardspahr.com](mailto:SafierP@ballardspahr.com)>  
**Subject:** RE: United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

**⚠ EXTERNAL**

Thanks, Tom. I'm available after 3pm. Please let us know when works best for you.

Anna



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**Cc:** Safier, Paul J. <[SafierP@ballardspahr.com](mailto:SafierP@ballardspahr.com)>  
**Subject:** United States v. Combs, 24 Cr. 542 (AS) - Subpoena to Warner Bros. Discovery

Counsel,

Ballard Spahr has been retained by Warner Bros. Discovery in connection with your client's subpoena in the above-captioned matter. Please let us know your availability later today for a call to meet and confer.


Thank you,  
Tom Sullivan

**Thomas B. Sullivan**  
**He/Him/His**  
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